

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

SHERRI LYNN BUTLER)	
)	
Plaintiff,)	
)	
v.)	No. 1:07-cv-184
)	
CITY OF ENGLEWOOD,)	
)	
CHIEF DANIEL BLAKE,)	
In his individual capacity and as agent for)	
City of Englewood,)	
)	
OFFICER RANDY GABREL,)	
In his individual capacity and as agent for)	
City of Englewood,)	
)	
LT. DARRELL WRIGHT,)	
In his individual capacity and as agent for)	
City of Englewood,)	
)	
Defendants.)	

MEMORANDUM IN SUPPORT OF MOTION FOR PERMISSION TO FILE A
MEMORANDUM IN EXCESS OF TWENTY-FIVE PAGES IN SUPPORT OF MOTION
FOR SUMMARY JUDGMENT

Defendants Town of Englewood, Daniel Blake, Randy Gabrel and Darrell Wright hereby appear, by and through counsel, and request permission of this Honorable Court to file a Memorandum in Support of their Motion for Summary Judgment in excess of twenty (25) pages.

These Defendants' request is based upon good cause. Under Local Rule 7.1, briefs are limited to twenty-five (25) pages in length. In this case, however, good cause exists for permission to file a brief over twenty-five (25) pages. The Plaintiff has sued four (4) Defendants. The Complaint contains eleven (11) separate causes of action. The discovery in this case is quite voluminous. The transcript of Plaintiff's discovery deposition of Plaintiff

Sherri Lynn Butler is two hundred and eight (208) pages long. The transcripts of the individual Defendants are a total of two hundred and eighty-five (285) pages long. Thus, the Plaintiffs' multiple claims and the sizeable nature of the discovery materials in this matter present good cause for allowing permission to file a Memorandum in Support of these Defendants' Motion for Summary Judgment exceeding twenty-five (25) pages.

Accordingly, it is respectfully requested that this Honorable Court permit the Defendants to file a Memorandum in Support of their Motion for Summary Judgment in excess of twenty-five (25) pages.

RESPECTFULLY submitted this 24th day of June, 2008

RESPECTFULLY SUBMITTED,

TOWN OF ENGLEWOOD, CHIEF DANIEL
BLAKE, OFFICER RANDY GABREL, and LT.
DARRELL WRIGHT

By: /s/Reid A. Spaulding, BPR No. 023363
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CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2008, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operations of the Court's electronic filing system to all parties indicated n the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system:

Robin Ruben Flores
4110 – A Brainerd Road
Chattanooga, Tennessee 37411
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Dated June 24, 2008.

/s/Reid A. Spaulding, BPR No. 023363
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